



Nebraska Department of Agriculture
Bureau of Plant Industry
Pesticide Program

Pesticide Technical Interpretation

PTI 2.0: Termiticides

(Last Revision: 08-01-05)

Background:

Frequent and inconsistent changes to termiticide labels (both conventional liquids and baits) have created significant confusion among applicators of these products. NDA requires that all termiticide treatments be applied according to the label in order to provide the best possible protection of the structure while reducing human and environmental adverse effects. To this end, NDA will utilize the following terms and definitions when interpreting termiticide labels.

Interpretation:

Conventional Liquid Termiticide: Conventional liquid termiticides are those chemicals designed to be diluted in water and applied so a continuous chemical barrier is established in the soil or structure. These products are traditionally further identified as repellent or non-repellent types. Repellent liquid termiticides repel the termite from entering the structure as much as they kill the termite outright. Non-repellent liquid termiticides act as toxicants or growth regulators of termites, but have not shown they repel termites. Both types of termiticides have shown they provide adequate protection of the structure when applied as complete treatments.

Termite Bait Systems (Definition and Installation): Termite bait systems are designed to provide for lower toxicity chemicals that are installed at regular intervals around and sometimes inside of the structure's foundation. Because the directions are listed on the product label, the installation, monitoring, and introduction of the chemical bait are considered pesticide applications. Since the action of installing and monitoring bait stations and active ingredient baits is considered a structural pesticide application, all certification and record keeping rules apply. Where bait system label instructions indicate "regular" monitoring should occur (without specific time frames listed for the frequency of monitoring), NDA defines this to mean monitoring will occur on a regular basis as recommended or required by the manufacturer during seasons where termite activity can be expected, both before and after the active ingredient is introduced, and at least once every three months during periods when soils are frozen or other environmental conditions warrant a reduced monitoring frequency. Unless specifically identified on the label, bait systems are not considered complete treatments when installed as the exclusive method of termite control.

Complete or Full Treatment: Traditionally, a complete or full treatment was defined as treatment of the exterior perimeter foundation, interior subslab or crawlspace areas, and injection into wall voids. Current labels have moved away from using the terms "complete" or "full;" however, termite control contracts still use these terms. Therefore, NDA believes a definition is still warranted so structural applicators have an understanding of what NDA's expectations are for compliance with termiticide labels.

A complete or full treatment is one in which a continuous conventional chemical barrier is established so the entire structure is protected from termite invasion. Termiticide labels that specifically define what a complete or full treatment is, are compliant with NDA's definition. In cases where labels do not specifically identify what a complete or full treatment is, and a complete or full treatment is sold or contracted to the property owner, NDA expects the termiticide to be applied so a continuous barrier of chemical is applied between the structure and the termites, per label directions.

If a bait system label indicates it is a complete or full treatment when properly installed, NDA believes the product manufacturer and pest control professional bear the liability of product performance. Some bait system

labels require the addition of a conventional liquid termiticide be used in order to provide for a complete or full treatment. NDA expects applicators to install bait stations spaced at the interval specified by the label, in a manner that protects both exterior and interior structural zones, as per label directions. While NDA currently has no regulations regarding service contracts, NDA considers documents specifying a "complete" or "full" treatment to be part of the pesticide application record identifying the site or area treated. In cases where the termiticide label allows for reduced treatment (such as an exterior perimeter with localized interior treatment), any document stating otherwise would be considered erroneous record keeping. Contracts for termite treatments will be taken into consideration when determining compliance of applications made according to label directions.

Spot or Partial Treatment: Spot or partial treatments are those which involve localized areas of a structure infested with termites and establish or re-establish a continuous chemical barrier protecting the structure. Unless otherwise specified on the label, NDA believes the pest management professional should determine the appropriate distance to be treated.

Trench and Rod: Currently, all liquid termiticide labels require either a trench or a trench and rod application around the exterior foundation. In either case, trenching is required; therefore, application of liquid termiticide by rodding alone is inadequate and considered a violation of the label directions. An exception to this would be in situations where site conditions (soil, structure, or landscaping) would prevent trenching. NDA expects that exterior wall treatments greater than one foot in depth must incorporate both a trench and a rod application in order to ensure that a complete chemical barrier is created. Trenches must be made to a depth adequate to hold liquid termiticide while backfilling the excavated soil, unless site conditions or label directions dictate otherwise. Injection of liquid termiticide by rodding must be done continuously from surface to required depth, with equipment sufficient to reach the depth required for the structure (in other words, a 3-foot rod cannot feasibly treat to a 4-foot depth).

Retreatment: Conventional liquid termiticide labels usually indicate that retreatment of the structure is only allowed for reinfested areas, and do not allow a complete treatment. These same labels also frequently fail to indicate how much of the structure should be retreated or how much time should elapse before a complete treatment can again be made. Given that all conventional liquid termiticides are required by EPA to demonstrate a minimum of five years of control, NDA will require this as the minimum period of time after the last complete treatment before another complete treatment can be made. If a reinfestation occurs before the five-year period expires, NDA expects the pest management technician will treat the infested area as a spot or partial treatment, as defined above, unless conditions for effective control warrant a larger portion of the structure be treated.

Calculation of Application Volume: All liquid termiticide labels require a given volume of tank mix solution be applied per linear foot of wall multiplied by a vertical distance in feet (thus creating a square-foot measurement). In order to comply with label requirements, liquid termiticide application volumes must be calculated using both linear distance and depth of treatment. Frequent calibration of application equipment should be done so inadequate or excessive volume is not applied.

Fine Print:

Title 25, Chapter 2, Nebraska Administrative Code, §010 States: Technical Interpretations. Pursuant to §2-2626(3)(f) of the Pesticide Act, the Department may, as it deems necessary or appropriate, issue technical interpretations that provide further guidance and policy on the use of pesticides to minimize or mitigate potential or documented negative impacts on humans or the environment. §010.02 states that technical interpretations shall provide guidance regarding use inconsistent with the pesticide label as set forth in 007.01D. In layman's terms, this means that a use of a pesticide contrary to this Technical Interpretation constitutes a label violation, which can be enforced by fines or penalties. NDA feels this Technical Interpretation in no way modifies any pesticide label from its original, EPA-registered language.

References to material not prepared by NDA in this document should not be considered an endorsement by NDA, nor is NDA responsible for the content of referenced material.

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